

EXHIBIT “D”

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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4 _____
EVELYN CINTRON, :
 Plaintiff : Civil Action No. 19-4078
5 :
 vs. :
6 :
CITY OF PHILADELPHIA, et al., :
7 Defendants :
8 _____
9

10 Deposition of: Maureen Rush

11 Taken by : Thomas O. Fitzpatrick, Esquire

12 Before : Lisa L. Miller, RPR

13 Date : Friday, November 3, 2023

14 At : Zoom Videoconference
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11 (None.)

12 * * * *

1 becomes a commander at PAL; yes?

2 A. She becomes the commanding officer of the
3 police PAL officers, yes.

4 Q. Okay. And just so that we're clear -- I think
5 we understand the structure from prior deposition
6 testimony. But I'll certainly give you the opportunity
7 to explain the structure of the PAL relationship to the
8 police department and that partnership. So why don't
9 you tell us about that.

10 A. So the police department and the -- and the
11 employees of the police department, the police officers,
12 the commanding officer, who was, again, a sworn officer,
13 in this case lieutenant, is different than the civilian
14 employees who are working for the board which is a
15 501(c)(3), and that -- there is -- the police commander
16 oversees the police officers who are assigned to the PAL
17 detail. And that's what these officers do every day.
18 It's a full -- they are transferred into PAL. That
19 commanding officer is their commanding officer for all
20 aspects of their duties.

21 The executive director reports to the board of
22 directors and is responsible for the strategic mission,
23 you know, employment of all the civilian staff.

24 The police commander does not report to the

1 board but reports inside the Philadelphia Police
2 Department, so whoever the commissioner designated.

3 Q. Okay. And let me ask you this: During your
4 time as a police officer, did you have any involvement
5 with PAL?

6 A. I'm sure I did. I was -- I was a lieutenant in
7 the 25th District and I'm sure, you know, we came across
8 PAL. But I wasn't a member of the board at that point.

9 Q. You were not a member of the board, obviously,
10 but were you -- were you assigned to the PAL detail at
11 any time during your service as a police officer?

12 A. No, I was not.

13 Q. Okay. And the -- so PAL was a stand-alone
14 501(c)(3) organization, correct?

15 A. Correct.

16 Q. And then you have the Philadelphia Police
17 Department and in tandem they work the Police Athletic
18 League; is that right?

19 A. Correct.

20 Q. And what you've just explained is that Ted
21 Quali is the executive director and he reports to the
22 PAL board; is that right?

23 A. Correct.

24 Q. And Lieutenant Cintron is the commanding